

**REMARKS**

Reconsideration of this application, in view of the foregoing amendment and the following remarks, is respectfully requested.

Claims 1-88 were originally presented for consideration in this application. Claims 89-103 were added by preliminary amendment. Claim 14 has been canceled. Accordingly, claims 1-13 and 15-103 are currently pending in this application.

The examiner's indication that claims 69-72 are allowed is noted with appreciation.

The following rejections, objections, and requirements were set forth in the Office Action:

1. The drawings are objected to;
2. Claims 1-7, 10-13, 15, 23, 24, 29, 31, 34, 36, 38, 49-51, 55-59, 77, 81-83, 89-91, 95, 102 and 103 stand rejected under 35 USC §102(b) as being anticipated by U.S. Patent No. 6,354,375 to Dewey;
3. Claims 1-6, 10, 11, 15-16, 23-25, 29-34, 36-39, 49-51, 55-59, 77, 81-84, 89-91, 95, 102 and 103 stand rejected under 35 USC §102(b) as being anticipated by U.S. Published Application No. 2002/0112857 of Ohmer, et al.;
4. Claims 1, 9-11, 26, 28, 55, 76-80, 89, 102 and 103 stand rejected under 35 USC §102(e) as being anticipated by U.S. Published Application No. 2004/0159435 of Pluchek, et al.;
5. Claims 39 and 84 stand rejected under 35 USC §103 as being unpatentable over Dewey;

6. Claim 84 stands rejected under 35 USC §103 as being unpatentable over Ohmer;

7. Claims 8, 27 and 75 stand rejected under 35 USC §103 as being unpatentable over Plucheck; and

8. Claim 96 stands rejected under 35 USC §103 as being unpatentable over Dewey or Ohmer in view of U.S. Patent No. 6,561,277 to Algeroy, et al.

Regarding the objection to the drawings, please note that a new drawing sheet containing FIG. 1A is submitted herewith. As suggested by the examiner in section 1 of the Office Action, FIG. 1A depicts the well system 10 prior to installation of the deflector assembly 26, liner string 38, and access and flow control device 58 in the wellbore junction 18. Since this configuration of the well system 10 is apparent to a person skilled in the art from the description contained on pages 6-11 of the specification, no new matter is introduced by the new drawing sheet.

By the above amendments to the specification, the Brief Description of the Drawings section of the specification has been amended to include a brief description of the new FIG. 1A, and a paragraph has been added to page 11 of the specification to recite the well system 10 as depicted in FIG. 1A. In view of these amendments to the drawings and specification, the examiner is respectfully requested to withdraw the objection to the drawings.

Regarding the anticipation and obviousness rejections, please note that each of the independent claims 1, 11, 55 and 89 has been amended above to make it clear that the wellbore junction of the present invention is interconnected in, and forms a part of, the casing string while the casing string is being installed and run into the well, as suggested by the examiner in section 13 of the Office Action. In contrast, each of the Dewey, Ohmer and Plucheck references describes an apparatus which is installed within a casing string after the casing string is already installed in the well.

This means that the flow passages and access through the Dewey, Ohmer and Plucheck apparatuses are necessarily relatively small compared to those provided by the present invention. Furthermore, the Dewey, Ohmer and Plucheck apparatuses require a separate time-consuming and expensive operation to install, whereas the present invention can be installed at the same time as the casing string. Thus, the present invention provides significant advantages over the prior apparatuses, and the examiner is respectfully requested to withdraw the anticipation and obviousness rejections of claims 1-16, 23-34, 36-39, 49-51, 55-59, 75-84, 89-91, 95, 96, 102 and 103.

Since the foregoing amendments do not raise new issues (the same issues were considered in the previous Office Action and applicant's response thereto) and place the application in better form for appeal, entry of the amendments is respectfully requested under the provisions of 37 CFR 1.116.

The examiner is respectfully requested to consider the previously withdrawn claims 17-22, 35, 40-48, 52-54, 60-68, 73, 74, 85-88, 92-92 and 97-101 in the present application, since these claims are dependent from allowable generic claims.

In view of the foregoing amendment and remarks, all of the claims pending in this application are now seen to be in a condition for allowance. A Notice of Allowance of claims 1-13 and 15-103 is therefore earnestly solicited.

The examiner is hereby requested to telephone the undersigned attorney of record at (972) 516-0030 if such would expedite the prosecution of the application.

Respectfully submitted,

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